

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

LEON WEINGRAD, individually and on behalf of all others similarly situated,

Plaintiff,

V.

DH & RK INVESTMENTS LLC D/B/A  
FUNDQUBE,

Defendant.

:  
: NO. 9:24-cv-80701

**: PLAINTIFF’S UNOPPOSED MOTION**  
**: TO TRANSFER AND AMEND THE**  
**: COMPLAINT**

Plaintiff Leon Weingrad requests that the Court transfer this action to the Central District of California and grant Plaintiff leave to file an amended complaint.

Pursuant to 28 U.S.C. § 1404(a), “For the convenience of parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought or to any district or division to which all parties have consented.” Here, transfer of this action to the Central District of California is appropriate because both Plaintiff and Defendant consent to the transfer.

Pursuant to Rule 15(a)(2), “a party may amend its pleading only with the opposing party's written consent”. Here, Plaintiff is entitled to file an amended complaint because Defendant consents to the amendment.

Accordingly, Plaintiff Weingrad requests that the Court transfer this action to the Central District of California and grant him leave to file the amended complaint.

**CERTIFICATE OF CONFERRAL**

On July 5, 2024, Plaintiff's counsel conferred with Defendant DH & RK Investments LLC's counsel regarding the relief requested in this motion, and can represent that Defendant consents to the relief requested in this motion.

/s/ Avi R. Kaufman

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